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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

No. 3:22-cr-00213-MO-2

v.

Plaintiff,

**DECLARATION OF COUNSEL IN
SUPPORT OF UNOPPOSED MOTION
TO CONTINUE TRIAL DATE**

JENNIFER MCCONNON,

Defendant.

I, Kara A. Sagi, declare:

1. I am the attorney appointed to represent Jennifer McConnon, in the above-entitled case.
2. A jury trial in this case is currently scheduled for May 14, 2024. Ms. McConnon was arraigned on July 29, 2022. Five prior continuances have been sought by the defense.
3. Efforts to resolve Ms. McConnon's case pretrial are ongoing. More time is needed to discuss prospective pretrial resolution with the government. Additionally, the gathering of mitigation and other case-related information continues to occur. This information is pertinent to negotiations and any future sentencing hearing. Ms. McConnon therefore respectfully requests that

this Court continue her case for a period of approximately 120 days or more to accomplish these tasks.

4. Ms. McConnon is currently on pretrial release and has not had any non-compliance issues.

5. I have discussed with Ms. McConnon her right to a speedy trial. She agrees to the continuance and knows it will result in excludable delay under the provisions of 18 U.S.C. § 3161(h)(7)(A) of the Speedy Trial Act.

6. Assistant United States Attorney Scott Kerin has no objection to this motion.

7. I have discussed this request with counsel for the codefendant, and the codefendant will be asking for a 120-day continuance as well.

8. I make this motion in good faith and not for the purpose of delay.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on April 29, 2024, in Portland, Oregon.

/s/ Kara A. Sagi
Kara A. Sagi
Assistant Federal Public Defender